Dear FCC:

Thank you for assigning an RM number to our petition and for putting it out for public comments. Mr. Tippett and I are most grateful to have the opportunity now for our proposal to be reviewed by our peers in the amateur community in the "court of public opinion."

Since its filing on September 17, 2001, we have had an opportunity to conduct private discussions among our peers regarding the possible impacts upon 160M operations today if our proposal were to be adopted by the Commission. Two themes have emerged out of these discussions and have been raised for consideration:

1) If the lower limit of WIDEBAND modes (SSB/AM/SSTV) is set at 1843 kHz on 160M, will this not have some bearing upon the ability of amateurs to resonate their antennas for both SSB and CW work on 160M? In today's world, with all modes allowed in the region between 1800-1843, this is not an issue. However, this could be a concern if the Briggs/Tippett petition is adopted. Was consideration given to these impacts by the proponents and, if so, what?

Comment:

While the concern raised is certainly a valid one, it can be dealt with successfully by resonating one's antenna for 160M at about 1843 or 1840 which is the demarcation line between the proposed NARROWMODE and WIDEBAND MODE segments. Most antennas (unless truly shortened, loaded ones) will present at least a 20kHz bandwidth with a standing wave ratio of below 2:1 above and below the point of resonance on 160M. This allows acceptable transmitter tuning within the normally desired 2:1 SWR points between at least 1820 - 1860 kHz which should satisfy most amateurs. It will, for example, allow access to DX'ing interests on the low end of Topband, casual CW ragchewing down to 1820 (or lower) as well as SSB and other wideband operations from 1843 kHz to about 1863 and perhaps a bit higher. This should be acceptable to the vast majority of amateurs who enjoy the low-end of Topband today.

There is also the availability today of commercial antenna tuners that cover 160M not to mention simple low impedance to low impedance coaxial tuners which will allow even a shortened antenna for 160M to be brought to a 1:1 resonance at most any point within the 160m band.

Based upon these factors, it is believed that the separation of wideband and narrowmode operations at the low-end of 160M should present no serious impediments from an antenna bandwidth standpoint to most amateurs, if the petition as proposed were to be adopted by the Commission.

2) A second point raised for discussion is the manner by which DX operations on SSB mode will be conducted going forward during competitive operating events, eg: during the SSB ARRL DX and SSB CQWW DX contests and the CQ Magazine 160M SSB contest.

In today's world, much SSB contest DX work is conducted "simplex" since many overseas administrations allow SSB work down to 1830, some to 1825 and some even to down as low as about 1810kHz. This too is a relevant concern and questions have been raised to the proponents as to how this issue will be dealt with should the Commission adopt the rulemaking requested.

Comment: Most overseas administrations also allow SSB operations to at least 1850 kHz. Some overseas administrations allow SSB work to even higher in the 160M band to about 1870kHz. During the recently completed CQWW SSB contest in October 2001, for example, European stations were observed working each other and North American stations to as high as 1870 kHz. This means that there will remain "overlapping" zones for SSB DX work via simplex operations on Topband from 1843 to at least 1850 kHz in nearly all countries granting 160M priveleges around the world today and to even higher frequencies (such as to 1870 kHz) in other selected overseas countries.

In addition, some USA to overseas contest work was observed by stations operating via SPLIT mode. In this case, the target DX station was operating below 1843 kHz (or even higher in the band) and announcing listening (QSX) frequencies elsewhere within the recommended US ARRL Bandplan SSB segment, in order to make contest contacts.

The point here is that contest operators can and will adjust their SSB contest operations accordingly to comply to the new regulations, if adopted by the Commission, and the experience gained during the CQWW SSB DX Contest of October 2001 has proven this to be a viable approach to SSB contest operations on 160M, if adopted.

Finally, most casual SSB Dx'ing on 160M today occurs anyway above 1840kHz and if the Commission elects to add an exclamation point to this practice by enacting communication law to formalize such a practice going forward, it should be accepted willingly by most amateurs who frequent Topband.

Sincerely,

Jeffrey T. Briggs, K1ZM